

## UNITED STATES DISTRICT COURT

for the

Northern District of New York

UNITED STATES OF AMERICA )

v. )

BRIAN NORTON )

Case No. 5:14-MJ-100 (DEP)

Defendant(s) )

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the date(s) of beginning in or about November of 1997 and continuing up through in or about December of 2011 in the county of Onondaga in the Northern District of New York, and elsewhere, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1038(a)

18 U.S.C. § 876(c)

*Offense Description*

False Information and Hoaxes

Mailing Threatening Communications

This criminal complaint is based on these facts:

Please see attached Affidavit of FBI Special Agent Daniel Capone.

☒ Continued on the attached sheet.

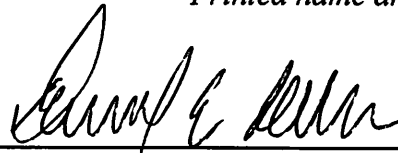
*Complainant's signature*

Daniel Capone, Special Agent, FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date: June 9, 2014


*Judge's signature*

City and State: Syracuse, New York

Hon. David E. Peebles, U.S. Magistrate Judge

*Printed name and title*

AFFIDAVIT IN SUPPORT OF CRIMINAL  
COMPLAINT AND ARREST WARRANT

INTRODUCTION

Daniel Capone, being duly sworn, deposes and says:

1. I am an investigative or law enforcement officer of the United States, within the meaning of Section 2510(7) of Title 18, United States Code, and am empowered by law to conduct investigations of and to make arrests for offenses enumerated in Chapter 113B of Title 18 of the United States Code, including Sections 1038(a) and 876(c) of that Title.

2. I have been a Special Agent of the Federal Bureau of Investigation (hereinafter "FBI") for over twelve years and am currently assigned to the Syracuse Resident Agency, where I work on the Joint Terrorism Task Force (hereinafter "JTTF"). My experience as an FBI agent includes being assigned to conduct criminal investigations in the Northern District of New York concerning domestic and international terrorism. During my employment with the FBI, I have received training in both investigative procedures and evidence recovery. As a federal agent, I am authorized to investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States. In my work as an FBI Special Agent, particularly in domestic and international terrorism investigations and with the JTTF, I regularly work with and consult other Special Agents and law enforcement officers. I have personally investigated dozens of cases involving threatening letters, most of which threaten to contain a deadly substance (also known as a "White Powder Letters" or "WPLs"). I have also assisted with many other WPL investigations, and I regularly keep apprised of significant WPL investigations taking place in the United States.

3. Along with other Special Agents from the FBI, members of the JTTF, Special Agent Matthew Puro of the United States Postal Inspection Service, and prosecutors with the United

States Attorney's Office for the Northern District of New York (hereinafter "USAO-NDNY"), I have been conducting an investigation of criminal activity involving a series of threatening WPL letters, which I have named the 'Syracuse Series.' The Syracuse Series is comprised of a total of 21 threatening letters. All 21 letters appear to have been written by the same author. All were mailed using the U.S. Postal system to various victims - some mailed to victims within New York and some mailed from Syracuse, New York to victims in other states and the District of Columbia. All of the Syracuse Series WPLs were mailed between 1997 and 2012. All of the Syracuse Series WPLs contained a white powdery substance, except one – the first WPL in 1997 threatened contamination by the AIDS virus without including powder. And all of the Syracuse Series WPLs threatened death to the addressee/victim/recipient; twenty of them threatened death by anthrax or ricin contamination, and one (the above-referenced first WPL from 1997) threatened death by the AIDS virus. Mailing letters through the U.S. Postal system containing powder represented (falsely) to be anthrax or ricin may constitute a violation of federal law, including violations of 18 U.S.C. Section 1038(a), False Information and Hoaxes, and 18 U.S.C. Section 876(c), Mailing Threatening Communications.

4. The information in this Affidavit is drawn from the investigation, observations and experience of the Affiant and other Special Agents and law enforcement officers participating in this investigation, many of whom have experience in investigating domestic and international terrorism and weapons of mass destruction offenses. The statements in this Affidavit are based, in part, on information personally known by the Affiant, as well as information provided by other law enforcement officers, directly and through their reports, open source searches of the Internet, records obtained via Grand Jury subpoenas, and information gleaned from warrantless searches of the trash which was left at the street-side for pickup.

#### Criminal Complaint and Arrest Warrant Sought

5. I submit this Affidavit in support of a criminal complaint and an arrest warrant

charging BRIAN DANIEL NORTON with violating: Title 18, United States Code, §1038 (titled False Information and Hoaxes – here, conveying false threats of anthrax or ricin poisoning); and Title 18, United States Code, §876 (titled Mailing Threatening Communications – here, mailing letters using the U.S. mail system both within New York State and nationally, threatening death by poisoning or infection by anthrax, ricin, or in one case the AIDS virus). The alleged conduct occurred beginning in or about 1997 and continued through in or about 2012 in Onondaga County and elsewhere in the United States. The facts set forth in this Affidavit are based on my own investigation, together with information I obtained from a variety of sources, including FBI and other law enforcement and government sources, official FBI records and analysis, materials sought by subpoena and analysis of public records, surveillances, and other information, including the information described above. I have not included every fact regarding this investigation in this affidavit. Rather, I have set forth only the facts I believe are necessary to establish probable cause to believe that the above-identified federal crimes have been committed by BRIAN NORTON.

#### SUMMARY OF INVESTIGATION

6. In January, 2010, eight (8) threatening letters containing white powder, known amongst law enforcement agents as WPLs, were mailed from Syracuse, New York to eight different addressees/victims. Each WPL threatened that the white powder included inside the envelope was a deadly substance (either anthrax or ricin) that would cause the recipient of the letter to immediately fall ill and die. One addressee/victim was a local school - Bishop Ludden Junior-Senior High School, located in Syracuse, New York. The other seven victims were individuals or governmental and military-related entities, each outside the State of New York. The entities included federal law enforcement agencies and members of Congress. Strong similarities and commonalities (words, phrases, handwriting, threat language,

stationery/paper used) among these letters indicate that they were likely to have been created by the same author, and the WPL investigation was dubbed "The Syracuse Series."

7. In addition to sharing a Syracuse, New York postmark, each of these WPLs bore what appeared to be nearly identical handwriting and nearly identical wording, which included, for example, the following passages from two different WPLs:

TO ARMY WAR MONGERING SCUM  
DID YOU REALLY THINK THE ATROCITIES AND WAR CRIMES YOU HAVE  
BEEN COMMITTING IN IRAQ & AFGHANISTAN WOULD GO  
UNAVENGED?! THE PAPER THAT YOU ARE HOLDING IN YOUR HANDS  
HAS BEEN THOROUGHLY SATURATED WITH ANTHRAX POWDER.  
HOPEFULLY YOU AND THOSE AROUND YOU WILL SOON DIE A SLOW  
AND PAINFUL DEATH FROM ANTHRAX. DEATH TO IMPERIALIST WAR  
MONGERING DOGS! WE HAVE LAUNCHED OUR ATTACK!! DIE DIE DIE

[This WPL was mailed to the Association of the United States Army in Arlington, Virginia, a social organization comprised of current and former officers of the United States Army.]

THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS RICIN - A  
HIGHLY TOXIC SUBSTANCE FOR WHICH THERE IS NO CURE.  
HOPEFULLY YOU AND THOSE AROUND YOU WILL DIE SLOWLY AND  
PAINFULLY FROM RICIN. ENOUGH RICIN TO BRING DEATH TO MANY  
PEOPLE IN A LARGE ROOM. DID YOU REALLY THINK THAT YOU WOULD  
GET AWAY WITH YOUR WAR CRIMES AND ATROCITIES IN IRAQ AND  
AFGHANISTAN - MURDERING THOUSANDS OF WOMEN AND CHILDREN  
UNSCATHED AND UNPUNISHED? THE DAY OF RECKONING HAS  
ARRIVED! WE HAVE LAUNCHED OUR ATTACK! REFLECT UPON YOUR  
HIDEOUS CRIMES AND DIE.

[This WPL was mailed to then-Secretary of Defense Robert Gates at the Pentagon.]

8. Inside the envelopes containing these WPLs, as in all but one (noted above) of the 21 WPLs in the Syracuse Series, was a quantity of white powder and language in the accompanying letters threatening that the enclosed powder was either anthrax spores or ricin powder. Of the 21 WPLs in the Syracuse Series, twelve (12) threatened anthrax, seven (7) threatened ricin, one threatened death from AIDS, and one contained powder but did not refer to either anthrax or ricin [Note: The two WPLs that did not refer to anthrax or ricin are linked

to the Syracuse Series by similarity in handwriting, postmark and selection of victim (one to Bishop Ludden Junior-Senior High School and one to LeMoyne College)]. Anthrax is a lethal disease caused by the bacteria *Bacillus Anthracis*. *Bacillus Anthracis* spores often appear as a white powder, and inhalation or ingestion of the spores can cause a deadly infection. Ricin is a highly toxic substance found in small amounts in the seeds of the castor oil plant. A threat conveyed using the U.S. mails to expose a person to *Bacillus anthracis* or ricin may constitute violations of 18 U.S.C. § 1038(a) and 18 U.S.C. § 876(c). Using simple, widely-publicized methods, ricin may be extracted from seeds and accumulated to form a poison that resembles a white or light-colored powder. Both anthrax and ricin poisoning can be fatal. In the past, the FBI has investigated cases wherein *Bacillus anthracis* or ricin toxin was delivered to a victim via an item in the mail. Those cases have been widely reported in the press and announced to the public via media outlets throughout the United States. For example, in the AMERITHRAX case in September 2001, seven (7) WPLs were mailed in a three-week period. Twenty-two people were infected, and five (5) died. Ricin was used to assassinate Bulgarian dissident Georgi Markov in 1978, an incident that received considerable press coverage. Other recent examples include the May 2013 WPLs containing ricin mailed to President Barack Obama, New York City Mayor Michael Bloomberg, and the offices of Mayors Against Illegal Guns in Washington, D.C..

9. My research next uncovered two closed cases that shared strong similarities to the Syracuse Series letters. In those cases, threatening WPLs were mailed in 1997, 1999, 2001 and 2002. From 1997 through 2002 a total of seven (7) threatening letters were mailed to Bishop Ludden Junior-Senior High School (four letters) and LeMoyne College (three letters). As is explained further in this affidavit, similarities including handwriting, postmark, selection of victim, commonality of return addresses, and unique phrasing link these seven

letters to the Syracuse Series. After comparing these seven letters to the more recent fourteen letters, I have concluded that they likely were written by the same person and therefore appropriately should be considered part of the Syracuse Series of WPLs. To date, the following have been direct victims of the Syracuse Series WPLs, having received a WPL in the mail:

Bishop Ludden Junior-Senior High School (five WPLs)  
LeMoyne College (three WPLs)  
FBI Headquarters  
CIA Headquarters  
BATF Headquarters  
International Association of Police  
United States Senator John McCain  
Secretary of Defense Robert Gates  
Association of the United States Army  
Marine Corps League  
United States Representative Ann Marie Buerkle  
[Victim # 1] (a television personality)  
[Victim # 2] (a television personality)  
[Victim # 3] (a local Syracuse commercial business)  
U.S. Navy/UDT SEAL Museum

10. In addition to the above-listed recipients of these letters, many others have been victimized. In a typical WPL incident, it is not only the recipient of the WPL who is threatened, but anyone who has come into contact with, or been near, the powder. For example, in a WPL received at a business or government office, the person who opens the envelope, is exposed to the powder, and reads the threat is victimized. Additionally, anyone else in the office is also potentially exposed (as most of the Syracuse Series WPLs threaten, “. . . enough to kill many people in a large room . . .”), as well as anyone in the building who may be sharing the same ventilation system. After an emergency law enforcement and hazardous materials (HAZMAT) response, the powder is packaged and sent to a certified laboratory for testing. Test results from initial DNA analysis of the claimed anthrax or ricin take approximately 12 to 24 hours to process after the lab receives the powder. Final lab

results from culture samples are not available until approximately 48 hours after receipt. Thus, those persons exposed to the letter and powder in the room, or in the building, do not and cannot know for many hours whether they have been infected with a deadly substance. Many such victims express concern over returning home for fear of infecting their families. They are often told by HAZMAT teams to shower, discard the clothes they were wearing when opening the letter, avoid going home, and to wait for tests results from the testing facility. Most of the Syracuse Series WPLs have borne a return address of an identifiable person. Individuals associated with each of the return addresses have been interviewed, some repeatedly, but I have concluded that none are responsible for sending the WPLs. It appears the sender intended that the names provided in these return addresses look like suspects to law enforcement, as part of a plan to lead law enforcement on a false trail. Moreover, each of the handwritten return names and/or addresses was slightly incorrect in some aspect, which again appears to be a purposeful tactic used by the sender to waste investigators' time and further the apparent false trails plan. The following individuals were victimized by virtue of having their name written (with slight variation) as the return addressee on a Syracuse Series WPL:

[Victim # 4, a resident of Camillus, New York]

[Victim # 5, a resident of Syracuse, New York]

[Victim # 6, a resident of Brewerton, New York]

[Victim # 7, a resident of Westchester, Pennsylvania]

[Victim # 8, a resident of Beverly Hills, California]



[Victim # 9, a resident of Jordan, New York]

[Victim # 10, a resident of East Syracuse, New York]

[Victim # 11, a resident of Syracuse, New York]

[Victim # 12, a resident of Skaneateles, New York]

[Victim # 13, a resident of Skaneateles, New York]

11. In addition to the above-described victims, who were intended recipients of the WPL or return addressees, many others were victimized at the locations where the envelopes containing the death threats and white powder were opened. Bishop Ludden Junior-Senior High School was fully evacuated more than once and emergency response teams were dispatched to the scene, events that resulted in significant disruption, fear, and news media coverage on television and in the newspaper. Hundreds of children were released mid-day, and hundreds of anxious parents were forced to leave home or work to respond to the school to pick up their children. The Syracuse, New York offices of United States Congresswoman Ann Marie Buerkle were evacuated and operations ceased. Offices of [Victim # 3] were evacuated and business was closed early when the Hazmat response occurred in their building. HAZMAT teams, firemen, law enforcement teams, individuals, and families were affected by virtually all of these letters in the Syracuse Series, as further detailed below. For each WPL, those who came into contact with the WPL or were present in the room when it was opened had to endure 24 to 48 hours of uncertainty, not knowing whether they had been infected with an actual deadly substance until laboratory results were returned a day or two later. Many expressed fear of going home and infecting their children and spouses.

12. Substantial governmental resources were expended in the response and investigation of the Syracuse Series WPLs, in addition to the risk of injury and vehicle mishaps by emergency responders. Although each response to the 21 WPLs was unique, every response involved multiple agencies dispatching personnel and equipment. Some of the agencies who responded to the Syracuse Series WPLs were the Arlington Fire Department HazMat Team, FBI Hazardous Materials Response Team (Washington Field Office), Prince George's County HazMat Unit, Fairfax County Fire and Rescue Department, Federal Protective Service, Pentagon Force Protection Agency, U.S. Capitol Police, Syracuse Fire Department, Syracuse Police Department, Onondaga County Sheriff's Department, United States Postal Inspection Service, United States Marshals Service, Government Services Administration, Montgomery County Hazardous Materials Response Team, West Conshohocken Police Department, FBI Hazardous Materials Response Team (Philadelphia Field Office), St. Lucie County Sheriff's Office, St. Lucie County Fire Department, St. Lucie County Health Department, Chester County Fire Department HazMat Team, and Westtown East Goshen Police Department.

13. Investigation to date has included analysis of internet protocol (IP) address records, trash covers, analysis of the alumni mailing lists of Bishop Ludden Junior-Senior High School and LeMoyne College (totaling almost 17,000 names and addresses), analysis of customer records of a nationally-known retailer (Victims # 1, #2, #7 and #15 are all publicly-known employees of this retailer), a media appeal consisting of local and national television and newspaper coverage, and an operation using alumni solicitations from Bishop Ludden Junior-Senior High School.

14. Significantly, latent fingerprints were found on two Syracuse Series WPLs, one from January 2010 and one from December 2011. Those fingerprints belong to BRIAN

NORTON, date of birth XX/XX/XXXX (58 years old), who resides at 5646 Central Avenue, Cicero, New York (the address of the residence to be searched). NORTON has been receiving Social Security benefits since his mid 20's. NORTON graduated from Bishop Ludden Junior-Senior High School and attended LeMoyne College for two years, but appears to have no employment history. NORTON does not have a driver's license. He resides with his father, who is in his 80s. Significantly, recent trash covers at this residence have recovered several pages of newspaper bearing handwriting and vulgar wording that matches the handwriting and language used in several of the Syracuse Series WPLs. Several of those newspapers also bear the handwritten names of prior victims of the Syracuse Series WPLs.

#### THE SYRACUSE SERIES

15. Approximately once per year, Bishop Ludden Junior/Senior High School (hereinafter "BLHS"), located at 815 Fay Road, Syracuse, New York, prints, addresses, and mails a solicitation for charitable donations for their ALUMNI FUND, the proceeds of which are used to support school programs. Several thousand solicitations are mailed in each instance. In November, 1997 employees of BLHS opened an item of mail comprised of a self-addressed envelope bearing the pre-printed address of the ALUMNI FUND. The envelope was postmarked November 6, 1997 and bore an inked "Syracuse" cancellation stamp, indicating that the letter was mailed from within the Syracuse postal area and processed at the Syracuse postal sorting facility.

16. Inside the envelope was an ALUMNI FUND pre-printed donation card and one piece of lined notebook paper. Handwritten upon the donation card was the following text [lowercase represents the pre-printed Alumni Donation Card; uppercase represents the handwritten text]:

DEAR TIMOTHY,  
 Sorry you weren't home for our fundraiser. Please help us out any way you can.  
 THE INVINCIBLE MARCH OF AIDS WILL KILL ALL PRIESTS!  
 Your name and class [name redacted]

PRAISE GOD FOR AIDS!!  
ACME FUEL OIL + FERTILIZER CO.  
Match funds: YES!! (hand drawn picture of a hammer and sickle, a common communist symbol)  
Science labs: X  
Other: X BISHOP LUDDEN SECRET POLICE (COMMUNIST PRIESTS AND NUNS AND INFORMERS)  
X [name redacted] 80  
DEAD FROM AIDS  
X [name redacted] 85  
X [name redacted] 82  
DEAD FROM AIDS!!  
X [name redacted]  
ALL PRIESTS + NUNS AT BISHOP LUDDEN DESERVE TO DIE!!  
Make checks payable to: Bishop Ludden Jr./Sr. High School  
SATELLITE OF THE SOVIET UNION OVER →

17. The reverse side of the donation card had the following handwritten text upon it:

AIDS WILL KILL ALL FAGGOT PRIESTS! PRAISE GOD FOR AIDS!! THERE'S NO CURE FOR AIDS!! FUCK OFF!! HAVE YOU MOLESTED ANY ALTAR BOYS?  
BISHOP LUDDEN SUCKS!! FUCK BISHOP LUDDEN!! YOU WILL DIE FROM AIDS!!  
TIMOTHY MCVEIGH (HERO OF OKLAHOMA CITY)  
ALFRED P. MUREAU  
FEDERAL BLDG.  
OKLAHOMA CITY, OKLAHOMA  
THE INEXORABLE MARCH OF AIDS WILL KILL ALL PRIESTS + NUNS!! I HOPE ALL YOU BASTARDS + BITCHES AT BISHOP LUDDEN DIE A SLOW AND PAINFUL DEATH FROM AIDS (ESPECIALLY PRIESTS)

18. The piece of lined notebook paper had the following handwritten text upon it: AIDS  
WILL KILL ALL OF YOU MOTHERFUCKED PRIESTS AND NUNS!!

19. Employees of BLHS considered the writing on the donation card and notebook paper to be threatening and they notified law enforcement.

20. In May, 1999 BLHS received another threatening letter written on unlined paper which read:

The paper and other materials that you are holding in your hands have been thoroughly contaminated with ANTHRAX spores! Hopefully you and those around you will soon die a slow painful death from ANTHRAX. We represent citizens for free choice and we have decided to launch a full scale attack on those who would deny a woman her choice to have an abortion. This means we will strike and strike hard those from the Catholic Church who speak out against abortion. Your time on this earth is limited. Soon you will die. We have launched our attack!  
die die die

21. BLHS employees found this letter threatening and notified law enforcement. The handwriting on this letter was similar in nature to that of the 1997 letter, and it appeared to have been written by the same person.

22. Approximately once per year LeMoyne College, located at 1419 Salt Springs Road, Syracuse, New York, prints, addresses, and mails a solicitation for charitable donations for their alumni fund, the proceeds of which are used to support school programs. Several thousand solicitations are mailed in each instance. In May 1999 a pre-addressed, pre-printed envelope was mailed to the LeMoyne College Office of Alumni, 1419 Salt Springs Road, Syracuse, New York. A letter written on unlined paper bore the following handwritten text:

The paper and other materials that you are holding in your hands have been thoroughly coated with ANTHRAX spores! Hopefully you and those around you will soon die a sloooow and painful death from ANTHRAX We represent citizens for free choice and we have decided to launch a full scale attack on those who would deny a woman her right to have an abortion. This means we will strike and strike hard those Catholics who oppose abortion. Your time on this earth is very limited! Soon you will die! We have launched our attack! DIE!! DIE!!

23. Employees of LeMoyne College found the letter to be threatening and notified law enforcement.

24. In May, 2002 BLHS received in the mail another pre-printed ALUMNI FUND envelope and donation card, and included inside the envelope was a newspaper article regarding the terrorist attacks of September 11, 2001. This envelope was postmarked May 8, 2002 in Syracuse, New York. Handwritten upon the newspaper article was the following text:

PRAISE ALLAH FOR SEPT. 11  
YOU ARE NEXT ANTHRAX ENCLOSED CIPRO NO GOOD  
(hand drawn picture of an eye)  
WE ARE WATCHING YOU  
HAHA  
PRAISE ALLAH NO MORE WTC DEATH TO CHRISTIANS + JEWS  
DEATH TO ISRAEL DEATH TO AMERICA

This text, written on the May, 8, 2002 WPL appears to mimic a threat mailed to the New York Post and NBC News in the widely-publicized AMERITHRAX case of September 2001.

25. The return address handwritten upon the outside of the envelope read, “[Victim # 4], [address redacted], Camillus, NY.” Investigation revealed that Victim # 4 did not author nor mail the letter and had no knowledge of it.

26. On the same day, also postmarked on May 8, 2002 in Syracuse, New York, a pre-printed Alumni Donation envelope and alumni donation card was mailed to LeMoyne College, Division of Institutional Advancement. In addition to the pre-printed alumni donation card, the envelope also included a newspaper clipping of a story regarding the terrorist attacks of September 11, 2001 and various clippings from the Examiner tabloid magazine. Handwritten upon the newspaper clipping was the following text:

PRAISE ALLAH FOR SEPT. 11  
YOU ARE NEXT  
WE ARE (hand drawn picture of an eye)  
WATCHING YOU  
DEATH TO ISRAEL  
DEATH TO CRUSADE MASSOUD ANTHRAX IN ENVELOPE  
YOU DIE  
CIPRO NO GOOD  
PRAISE ALLAH NO MORE WTC  
PRAISE ALLAH

This text, written on the May, 8, 2002 WPL appears to mimic a threat mailed to Senators Daschle and Leahy in the widely-publicized AMERITHRAX case of September 2001.

27. The return address handwritten upon the outside of the envelope was identical to the return address on the BLHS letter which was mailed the same day, it read, “[Victim # 4], [address redacted], Camillus, NY.” Investigation revealed that Victim # 4 did not author nor mail the letter, and had no knowledge of it.

28. Due to similarities in handwriting, verbiage used, the use of alumni donation cards and pre-printed return envelopes, and the Syracuse postmark, it was apparent that the same author had written and mailed each of the above-described letters.

29. On June 3, 2002 two more letters were mailed and postmarked from Syracuse. One was mailed to the BLHS Alumni Fund and bore the following handwritten text:

OSAMA BIN LADEN LIVES  
ANTHRAX SPORES IN ENVELOPE!  
DEATH FOR YOU!  
HAIL AL-QAIDA!

The other was mailed to the LeMoyne College Division of Institutional Management and bore handwriting upon the pre-printed alumni donation card which read: "LOEB, BERNSTEIN + GOLDBERG, ATTORNEY, [address redacted], SYRACUSE, NY 13208." Investigation revealed that there is no such law firm at that address nor at any other address. Both the BLHS and the LeMoyne letters bore the same handwritten return address which read: "[Victim # 5], [address redacted], SYRACUSE, NEW YORK 13208." Investigation revealed that there was no such person at that address. There was a Mrs. [Victim # 5] who lived in a nearby house on the same street, but she had no knowledge of these letters and was not suspected of having any involvement.

30. In January, 2010 a pre-printed alumni donation envelope was received at BLHS addressed to the LUDDEN FUND (the current name for BLHS's Alumni Fund). The letter was postmarked in Syracuse on January 22, 2010 and contained a pre-printed donation card bearing the following handwritten words:

THE ENVELOPE YOU HAVE OPENED CONTAINS A SMALL BUT  
EXTREMELY POWERFUL AMOUNT OF RICIN POWDER -  
A HIGHLY TOXIC SUBSTANCE -  
ENOUGH TO KILL SEVERAL PEOPLE IN A VERY LARGE ROOM!! DIE! DIE!  
I AM SO GOD DAMN SICK AND TIRED OF OPENING MY MAILBOX EVERY  
DAY AND GETTING SOMETHING FROM YOUR GOD DAMN FUCKING  
SCHOOL DEMANDING MONEY FOR YOUR TRIVIAL PETTY PROJECTS!  
TODAY YOU WILL SUFFER THE CONSEQUENCES!! YOU WILL DIE  
SLOOOWLY PAINFULLY!



**RICIN!**

**DIE!**

In Memory of: CHARLES MANSON

The reverse side of the donation card bore the following:

Does your company participate in a matching funds program? NO

Amount Pledged: \$0.00

Amount Enclosed: \$0.00

X Check/Money Order (enclosed)

Credit Card # \_\_\_\_\_ Exp. Date: **TODAY!!**

(signed) CHARLES R MANSON

31. The handwritten return address on the envelope read, “[Victim # 6], [address redacted], Cicero, New York 13029.” Interviews of Victim #6 found that she did not author the letter and had no knowledge of who did.

32. Within approximately one week, seven (7) additional threatening letters were mailed, all having similar verbiage, handwriting, and a Syracuse, New York postmark. The letters were as follows:

- A. Army Association of the United States  
2425 Wilson Blvd.  
Arlington, Virginia 22201

TO ARMY WAR MONGERING SCUM  
DID YOU REALLY THINK THE ATROCITIES AND WAR CRIMES YOU HAVE  
BEEN COMMITTING IN IRAQ & AFGHANISTAN WOULD GO  
UNAVENGED?! THE PAPER THAT YOU ARE HOLDING IN YOUR HANDS  
HAS BEEN THOROUGHLY SATURATED WITH ANTHRAX POWDER.  
HOPEFULLY YOU AND THOSE AROUND YOU WILL SOON DIE A SLOW  
AND PAINFUL DEATH FROM ANTHRAX. DEATH TO IMPERIALIST WAR  
MONGERING DOGS! WE HAVE LAUNCHED OUR ATTACK!!  
DIE DIE DIE

- B. Federal Bureau of Investigation  
935 Pennsylvania Avenue  
N.W. Washington, D.C. 20535

TO F.B.I. SCUM  
DID YOU REALLY THINK THE BRUTALITY & VICIOUSNESS YOU HAVE  
SHOWN TO ARABS AND AFRICAN AMERICANS WOULD GO  
UNAVENGED?! THE PAPER THAT YOU ARE HOLDING IN YOUR HANDS  
HAS BEEN THOROUGHLY SATURATED WITH ANTHRAX POWDER.  
HOPEFULLY YOU AND THOSE AROUND YOU WILL SOON DIE A SLOW  
AND PAINFUL DEATH FROM ANTHRAX. DEATH TO PIGS WHO  
BRUTALIZE AND OPPRESS DISADVANTAGED MINORITIES! WE HAVE  
LAUNCHED OUR ATTACK!! DIE DIE



C. International Association of Police  
100 Chase Avenue  
Yonkers, NY 10703

DEAR INTERNATIONAL ASSN. OF PIGS  
DID YOU REALLY THINK THAT YOU WOULD GET AWAY WITH YOUR  
CRIMES OF POLICE BRUTALITY AND ATROCITIES AGAINST  
AFRICAN-AMERICANS AND HISPANICS UNSCATHED AND UNPUNISHED?  
NOTHING COULD BE FURTHER FROM THE TRUTH. SOON YOU WILL DIE!!  
THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS RICIN A  
HIGHLY TOXIC SUBSTANCE FOR WHICH THERE IS NO CURE. ENOUGH  
RICIN TO BRING DEATH TO MANY PEOPLE IN A LARGE ROOM. SOON YOU  
DIE A SLOW PAINFUL DEATH. WE HAVE LAUNCHED OUR ATTACK!  
REFLECT ON YOUR CRIMES AND ....DIE SLOWLY

D. Marine Corps League  
P.O. Box 3070  
Merrifield, Virginia 22116

DID YOU REALLY THINK THE WAR CRIMES & ATROCITIES  
YOU HAVE BEEN COMMITTING IN IRAQ AND AFGHANISTAN WOULD GO  
UNAVENGED? MURDERERS OF WOMEN AND CHILDREN - YOU HAVE  
BEEN SENTENCED TO DEATH THE ENVELOPE THAT YOU HAVE JUST  
OPENED CONTAINS ENOUGH RICIN TO KILL MANY PEOPLE IN A VERY  
LARGE ROOM. HOPEFULLY YOU AND THOSE AROUND YOU WILL SOON  
DIE FROM RICIN - A HIGHLY TOXIC SUBSTANCE FOR WHICH THERE IS  
NO CURE. WE HAVE LAUNCHED OUR ATTACK

E. Robert Gates  
The Pentagon  
Washington, D.C. 20301

THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS  
RICIN - A HIGHLY TOXIC SUBSTANCE FOR WHICH THERE IS NO CURE.  
HOPEFULLY YOU AND THOSE AROUND YOU WILL DIE SLOWLY AND  
PAINFULLY FROM RICIN. ENOUGH RICIN TO BRING DEATH TO MANY  
PEOPLE IN A LARGE ROOM.  
DID YOU REALLY THINK THAT YOU WOULD GET AWAY WITH YOUR  
WAR CRIMES AND ATROCITIES IN IRAQ AND AFGHANISTAN -  
MURDERING THOUSANDS OF WOMEN AND CHILDREN UNSCATHED  
AND UNPUNISHED? THE DAY OF RECKONING HAS ARRIVED! WE HAVE  
LAUNCHED OUR ATTACK! REFLECT UPON YOUR HIDEOUS CRIMES AND  
DIE.

F. A.T.F.  
650 Mass. Ave.  
N.W. Washington, D.C. 20226

THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS RICIN A HIGHLY TOXIC SUBSTANCE FOR WHICH THERE IS NO CURE. HOPEFULLY YOU AND THOSE AROUND YOU WILL DIE SLOWLY AND PAINFULLY FROM RICIN. ENOUGH RICIN TO BRING DEATH TO MANY PEOPLE IN A LARGE ROOM. DID YOU REALLY THINK THAT YOU WOULD GET AWAY WITH YOUR CRIME OF MURDER OF THE INNOCENTS AT THE BRANCH DAVIDIAN COMPOUND IN WACO, TEXAS? THE DAY OF RECKONING AND RETRIBUTION HAS ARRIVED! WE HAVE LAUNCHED OUR ATTACK! REFLECT UPON YOUR CRIMES AND DIE.

G. Senator John McCain  
The Capitol Building  
Washington, D.C. 20515

TOO BAD THE NORTH VIETNAMESE PEOPLE'S LIBERATION ARMY DIDN'T KILL YOU WHEN THEY SHOT YOUR PLANE DOWN. HOWEVER, THAT IS SOMETHING THAT WE WILL QUICKLY REMEDY.

DEAR SENATOR McCAIN:

FOR YOUR CRIMES AGAINST THE NORTH VIETNAMESE AND FOR WAR-MONGERING AGAINST THE ARAB PEOPLE OF THE WORLD WE SENTENCE YOU TO DEATH. THE ENVELOPE THAT YOU ARE KEEPING NEXT TO YOU AND HAVE JUST OPENED CONTAINS ENOUGH RICIN TO KILL MANY PEOPLE IN A VERY LARGE ROOM. HOPEFULLY YOU AND THOSE AROUND YOU WILL SOON DIE A SLOW & PAINFUL DATH FROM RICIN-A HIGHLY TOXIC SUBSTANCE FOR WHICH THERE IS NO CURE!! DIE DIE WE HAVE LAUNCHED OUR ATTACK

33. Since January 2010, six (6) more threatening letters have been mailed from Syracuse, New York. All of these letters bear substantial similarity to those described in the preceding paragraphs. The letters are as follows:

A. [Victim # 1]  
c/o [company name redacted]  
[address redacted], Pennsylvania  
Postmarked October 18, 2010

Handwritten on a commercially-produced "Happy Birthday" greeting card was the following text:

Happy forty-fifth Birthday to our favorite host!  
(Birthday Wishes For a Special Friend  
Hope sunshine touches your day with happiness)  
Cheer up  
FORTY&FIVE  
ARE JUST

## WORDS

Handwritten inside the card were the following words:

...SO ARE OLD AND MENOPAUSAL

(hand drawn picture of an eye)

WE DENIZEN OF INNSMOUTH ARE WATCHING YOU! NAKED APE

Dear [Victim #1],

YOU, [Victim #7] (KEZIAH) & [Victim # 15] ARE ANDROGYNOUS  
MENOPAUSAL OLD PUBIC HAIRED FLATULENT FEMALE NAKED APE  
DEFECTORS WHOSE PROVENANCE IS ALIEN DUNG.

(three hand-drawn daggers dripping with blood)

[Victim # 8] WILL NOT BE LAYING HER SMELLY TURD.

[Victim # 7] WILL NOT BE LAYING HER SMELLY SHIT MUCH LONGER

A blissful day is one that sees Your hairy cunts destroyed & each secret dream come true when your hairy cunts with copious amounts of pubic hair R destroyed and that's the more-than-welcomed kind you're so very entitled to.

The envelope that you just opened contains RICIN! You and those around you will die slowly & painfully

Have a rotten & miserable Day!!

YOU ARE DANGEROUS MALEVOLENT WHORES AND AVARICIOUS  
HUCKSTERS WHO INVEIGLE OLD WOMEN TO BUY USELESS CRAPPY  
MERCHANDISE AND ROB THEM OF THEIR LIFE SAVINGS. YOU ARE  
STRANGE MENOPAUSAL OUTRE BEASTS WHO HAVE NO RIGHT TO  
LIVE!! YOUR SPIELS TO BUY MERCHANDISE ARE THE EQUIVALENT OF  
THE SMELLY NOXIOUS FARTS YOU BLOW QUITE LIBERALLY FROM  
YOUR SMELLY FOETID ASSHOLES. THEY BOTH CONTRIBUTE TO  
GLOBAL WARNING WITH THEIR METHANE AND SULFER CONTAINING  
(2) GASSES COMING FROM YOUR SMELLY FOETID ASSSHOLES AND  
YOUR RAUCOUS MOUTHS THE MERCHANDISE THAT YOU SELL ON  
[name of business redacted] IS AS WORTHLESS AS THE SMELLY TURDS  
THAT COME OUT OF YOUR SMELLY STINKING FOETID ASSHOLES.  
THERE WILL BE CONSEQUENCES FOR YOUR EGREGIOUSLY  
OUTRECUENT BEHAVIOUR! THE GREAT GODS CTHULHU AND DAGON  
SHALL RISE FROM THE SEAS AT INNSMOUTH AND THEY WILL  
MISERABLY DESTROY THE WITCH-HOUSE AT [company name redacted]  
INCLUDING THE OLD MESOCEPHALIC MONGOLOID WITCH [Victim # 7]  
(KEZIAH) AND HER FAMILIAR BROWN JENKIN! [Company name redacted]  
AND ALL OF ITS NEFARIOUS DENIZEN SHALL BE MERCILESSLY  
EXTIRPATED. YOUR WORMY AND LICE INFESTED HAIRY CUNTS SMELL  
LIKE DEAD FISH AS DO YOUR SMELLY, FOETID & NOXIOUS TURDS. THE  
MENOPAUSAL PUBIC HAIRED FLATULENT FEMALE NAKED APE  
DEFECATORS [Victim # 1], [Victim # 7] (KEZIAH) AND [Victim # 15] WILL  
BE DISSECTED NAKED ON THE ALTARS OF THE GREAT SEA GODS  
CTHULHU AND DAGON. YOUR HAIRY CUNTS WITH COPIOUS AMOUNTS  
OF PUBIC HAIR, WILL BE BURNED AS SACRIFICES YOU ARE THE  
LOWEST ORDER OF LIVING THING. YOU ARE NAKED APES, HAIRLESS  
APES, UNEVOLVED PRIMATE, SLIGHTLY REMODELED  
CHIMPANZEE-NAKED APE DEFECATORS & SHAVED MONKEYS.  
TRULY YOURS,  
WALTER GILMAN  
MISKATONIC UNIVERSITY

Also inside the envelope with the greeting card were several pieces of newsprint that

appear to have been ripped from a tabloid-style magazine. Written on the newsprint was:

(cartoon with three dogs and a man in a top hat scolding one of the dogs)  
THREE NEFARIOUS (THREE MENOPAUSAL OLD FARTS) HUCKSTERS  
(NAKED APES)  
YOUR GRAYING MENOPAUSAL, HAIRY & SMELLY CUNTS WILL BE  
RIPPED APART and BURNED [Victim # 8]'s HAIRY CUNT WILL, ALSO, BE  
RIPPED OPENED & BURNED  
[Victim # 7] SUGAR OLD TIMER? NAKED APE  
(one dog is labeled) [Victim # 1] FEMALE NAKED HUCKSTER  
(one dog is labeled) [Victim # 7] OLD TIMER ANDROGYNOUS MENOPAUSAL  
PUBIC HAIRED FLATULENT FEMALE NAKED APE  
[Victim # 8]'s SMELLY TURDS  
[Victim # 15]'s SMELLY TURDS YOU WILL BE RAPED, DISSECTED AND  
KILLED IN THAT ORDER  
[Victim # 7]'s AND [Victim # 1]'s SMELLY TURDS  
(the door to the living room is labeled) [company name redacted]  
(the living room is labeled) MENOPAUSAL FLATULENCE FACTORY

Also found on another torn page from a tabloid:

THE ANDROGYNOUS MENOPAUSAL PUBIC HAIRED FLATULENT  
FEMALE NAKED APE DEFECTORS [VICTIM # 1], [VICTIM # 7], [VICTIM #  
15] AND [VICTIM # 8] WILL HAVE THEIR GRAYING MENOPAUSAL,  
HAIRY AND SMELLY CUNTS RIPPED OPEN AND BURNED!  
WALTER GILMAN MISKATONIC UNIVERSITY  
[VICTIM # 7's] TURDS SMELL (AND NOT LIKE FLOWERS) SO [VICTIM #  
1's]  
[VICTIM # 7's] AND [VICTIM # 8's] COPROLITES WILL BE STUDIED FOR  
CENTURIES  
IF WE WERE AS PATHETIC AS YOU FEMALE NAKED APE DEFECATORS  
ARE WITH YOUR SMELLY TURDS AND UGLY MOLES WE WOULD HAVE  
COMMITTED SUICIDE AGES AGO.

On another piece of newsprint, a torn piece of a store advertisement:

YOU WILL NOT BE LAYING YOUR SHITTY DIRTY POOP MUCH LONGER  
WE KNOW WHERE YOU LIVE.

On another torn piece of advertisement that contains a toilet with a wooden cabinet:

[VICTIM # 7's] SMELLY FART & TURD ODOR

Another insert (torn piece of paper from store advertisement) is a picture of a video  
game entitled "Enslaved."

Another insert (torn piece of a Dilbert cartoon):

[VICTIM # 7]: YOU ARE A MENOPAUSAL OLD WHORE WHO SWINDLES  
OLD WOMEN OUT OF THEIR LIFE SAVINGS! WE HOPE YOUR

MENOPAUSAL HOT FLASHES ARE VERY VERY HOT AND UNBEARABLY PAINFUL

Another insert (torn piece of a newspaper cartoon page):

THE MENOPAUSAL OLD FART [VICTIM # 7] (KEZIAH) HAWKS HER CRAP ON [company name redacted]  
ANGEL FACE THE CRAP [VICTIM # 7] SELLS IS AS WORTHLESS AS HER SHITTY DIRTY POOP THAT COMES OUT OF HER ASSHOLE

Another insert (AARP Life Insurance Program Business Reply Mail postcard back):

X I'm not an AARP member. Please send information on how to join.  
Ms. [VICTIM # 1] (ANDROGYNOUS BITCH)  
[company name and address redacted], PENNSYLVANIA  
11/5/1915 FUCK YOU [Victim #1]  
[VICTIM # 1] + [VICTIM # 7] WILL NOT BE BLOWING THEIR SMELLY TURDS MUCH LONGER! AND NEITHER WILL [VICTIM # 8]. [VICTIM # 7], [VICTIM # 8]+ WILL BE RAPED, DISSECTED & KILLED. THEIR HAIRY CUNTS WILL BE EVISCERATED.

Other items inside the envelope were torn pieces of paper that are red, black and white and have pictures of skulls and a bat.

In the above-described WPL mailed to [VICTIM # 1], several names and phrases are identical to those used in science-fiction stories written by author H.P. Lovecraft. For example, Innsmouth is a fictional town in Massachusetts from the Lovecraft story The Shadow Over Innsmouth, and Walter Gilman is the main character, along with the witch Keziah Mason. Miskatonic University is the fictional school where Walter Gilman studied.

B. [Victim # 3]  
[ADDRESS]  
North Syracuse, New York 13212  
Postmarked May 6, 2011

Handwritten on a piece of pre-printed stationery paper bearing an image of a teddy bear was the following:

THE CURSES OF ALLAH BE UPON YOU!  
THE PAPER AND OTHER MATERIALS YOU ARE HOLDING IN YOUR HANDS HAVE BEEN THOROUGHLY CONTAMINATED WITH ANTHRAX SPORES. HOPEFULLY YOU AND THOSE AROUND YOU WILL SOON DIE A SLOOOOW PAINFUL DEATH FROM ANTHRAX. WE HAVE LAUNCHED FULL-SCALE ATTACKS AGAINST COMPANIES THAT DENIGRATE AND DISCRIMINATE AGAINST MOSLEMS AND YOUR COMPANY HAS THE "HONOR" OF BEING ONE OF THEM. WE WILL CAST TERROR INTO THE

HEARTS OF THOSE WHO DISBELIEVE. WE HAVE LAUNCHED OUR  
ATTACK & GOD WILLING YOU WILL BE NO MORE!! DIE DIE Usama bin  
Laden will be avenged

C. Rep. Ann Marie Buerkle  
25<sup>th</sup> Congressional District  
P.O. Box 7306  
Syracuse, NY 13261  
Postmarked May 6, 2011

Handwritten on a commercially-produced "Thank You" greeting card:

MAY THE CURSE OF ALLAH BE UPON YOU  
(handwritten picture of a dagger with blood dripping from it)  
...Nastiness comes naturally to a bitch like you!

Dear Rep. Buerkle,  
Usama bin Laden will be avenged! The paper and other materials that you are holding  
in your hands have been thoroughly contaminated with anthrax spores. God willing  
you and those around you will die a slooow painful death from anthrax. We have  
launched a full-scale attack against degenerate politicians who denigrate and  
besmirch Islam and you have the "honor" of being one of them. This card is to thank  
you for that. We will cast terror into the hearts of those who disbelieve. We have  
launched our attack and God willing you will be no more!! Die Die

D. [VICTIM # 7]  
[Company name redacted]  
[address redacted], PA  
Postmarked December 16, 2011

Enclosed was a commercially produced birthday card bearing the handwritten words:

[VICTIM # 7],  
YOU ARE A WORTHLESS FARTING WHORE – A BARBARO-FACED  
BABOON. THE ENVELOPE YOU HAVE JUST OPENED CONTAINS  
ANTHRAX. YOU WILL DIE.  
UNMERRY CHRISTMAS & A VERY UNMERRY BIRTHDAY!!  
DEAR [VICTIM # 7],  
YOU ARE AN ANDROGYNOUS MENOPAUSAL PUBIC HAIRE  
FLATULENT FEMALE NAKED APE DEFECATOR YOU ARE A BIG FAT  
SMELLY FETID PIG. BUT SOON YOU WILL BE LOSING A GREAT DEAL  
OF WEIGHT. DO YOU REMEMBER WHAT HAPPENED TO THE FEMALE  
NAKED APE DEFECATING WHORES WHOSE BODIES WERE FOUND ON  
OCEAN PARKWAY NEAR JONES BEACH! WE HAVE INTIMATE  
KNOWLEDGE AND YOU WILL SOON BE JOINING THEM! THE ENVELOPE  
THAT YOU HAVE JUST OPENED HAS BEEN THOROUGHLY  
CONTAMINATED WITH ANTHRAX SPORES. SHOULD THAT FAIL TO  
KILL YOU, YOU WILL BE RAPED, DISSECTED AND KILLED; WE KNOW  
WHERE YOU LIVE. YOUR HAIRY CUNT WILL BE EVISCERATED. YOU  
WILL NO LONGER LAY YOUR SMELLY TURDS. YOU WILL PAY THE  
ULTIMATE PRICE FOR SWINDLING NAÏVE OLD WOMEN OF THEIR LIFE  
SAVINGS. THE MERCHANDISE YOU SOLD ON [company name redacted]  
WAS AS WORTHLESS AS THE TURDS THAT COME OUT OF YOUR SMELLY  
ASSHOLE. YOUR SPIELS TO BUY MERCHANDISE WERE THE  
EQUIVALENT OF THE STINKING FARTS YOU BLOW QUITE LIBERALLY



FROM YOUR SMELLY ASSHOLE. PS. THE ENCLOSED DEAD INSECTS REPRESENT HOW YOU SOON WILL BE – STONE COLD DEAD.

E. National Navy UDT-Seal Museum  
3300 N. Highway A1A  
Fort Pierce, Fla. 34949  
Postmarked December 16, 2011

Enclosed was a commercially produced birthday card bearing the handwritten words:

HAPPY 50TH BIRTHDAY INDEED!! ANTHRAX  
(a hand-drawn picture of a dagger with blood dripping from it)  
...AND WONDERFUL NIGHTMARES THAT FILL YOUR YEAR WITH  
TERROR  
A LOYAL MOSLEM AND FOLLOWER OF AL-QAIDA  
HAPPY BIRTHDAY  
DEAR NAVY SEAL MUSEUM,  
USAMA bin LADEN WILL BE AVENGED! THE PAPER AND OTHER  
MATERIALS THAT YOU ARE HOLDING IN YOUR HANDS HAVE BEEN  
THOROUGHLY CONTAMINATED WITH ANTHRAX SPORES. GOD  
WILLING YOU AND THOSE AROUND YOU WILL DIE A SLOOOOW PAINFUL  
DEATH FROM ANTHRAX.

WE HAVE LAUNCHED A FULL-SCALE ATTACK AGAINST MURDEROUS  
THUGS AND GLORY TO GOD YOU WILL BE MERCILESSLY EXTIRPATED.  
THOSE WHO MURDER MOSLEM HOLY MEN AND THOSE WHO GLORIFY  
THEM SHALL DIE HORRIBLE DEATHS. YOU HAVE THE "HONOR" OF  
BEING AMONG THOSE WHO DENIGRATE AND BESMIRCH ISLAM AND  
YOU WILL PAY THE PRICE. WE WILL CAST TERROR INTO THE HEARTS  
OF THOSE WHO DISBELIEVE. WE HAVE LAUNCHED OUR ATTACK AND  
GOD WILLING YOU WILL BE NO MORE! DIE  
P.S. THE ENCLOSED DEAD INSECTS REPRESENT HOW YOU SOON WILL  
BE -  
STONE COLD DEAD

F. [Victim # 2]  
c/o [company name redacted]  
[STREET ADDRESS], Pennsylvania  
Postmarked December 16, 2011

Enclosed was a commercially-produced greeting card bearing the following

handwritten words:

[VICTIM #2],  
YOU ARE A WORTHLESS FARTING WHORE-A BIG FAT GARGANTUAN  
BARBARO-FACED BABOON. HOW MANY TAMALES AND TACOS HAVE  
YOU EATEN RECENTLY-YOU POT BELLIED BABOON? THE ENVELOPE  
YOU HAVE JUST OPENED CONTAINS ANTHRAX. YOU WILL DIE.  
UNMERRY XMAS & ROTTEN NEW YEAR  
DEAR [VICTIM #2],  
YOU ARE AN ANDROGYNOUS MENOPAUSAL PUBIC HAIRE  
FLATULENT FEMALE NAKED APE DEFECATOR. YOU ARE A BIG FAT  
SMELLY FETID PIG-BUT SOON YOU WILL BE LOSING A GREAT DEAL OF

WEIGHT.

DO YOU REMEMBER WHAT HAPPENED TO THE FEMALE NAKED APE DEFECATING WHORES WHOSE BODIES WERE FOUND ON OCEAN PARKWAY NEAR JONES BEACH? WE HAVE INTIMATE KNOWLEDGE AND YOU WILL SOON BE JOINING THEM! THE ENVELOPE THAT YOU HAVE JUST OPENED HAS BEEN THOROUGHLY CONTAMINATED WITH ANTHRAX SPORES. SHOULD THAT FAIL TO KILL YOU, YOU WILL BE RAPED, DISSECTED AND KILLED; WE KNOW WHERE YOU LIVE. YOUR HAIRY CUNT WILL BE EVISCERATED. YOU WILL NO LONGER LAY YOUR SMELLY TURDS. YOU WILL PAY THE ULTIMATE PRICE FOR SWINDLING NAÏVE OLD WOMEN OUT OF THEIR LIFE SAVINGS. THE MERCHANDISE YOU SELL ON [company name redacted] IS AS WORTHLESS AS THE TURDS THAT COME OUT OF YOUR SMELLY ASSHOLE. YOUR SPIELS TO BUY MERCHANDISE ARE THE EQUIVALENT OF THE STINKING FARTS YOU BLOW QUITE LIBERALLY FROM YOUR SMELLY ASSHOLE. P.S. THE ENCLOSED DEAD INSECTS REPRESENT HOW YOU SOON WILL BE-STONE COLD DEAD.

#### SIMILARITIES THAT IDENTIFY THESE LETTERS AS BELONGING TO THE SYRACUSE SERIES

34. Several different characteristics of the above-described letters are very similar, and I have concluded that the same author likely wrote and sent all 21 letters, which I have dubbed "The Syracuse Series." The handwriting appearing on the letters has evolved slightly over the sixteen years since they were first discovered, however, the handwriting has evolved slowly and very strong similarities are readily observable from each letter to the next occurring letter. Each of the WPLs has been mailed from, and postmarked from, the Syracuse, New York postal area. Almost all of the WPLs have borne a return addressee and return address written on the outside of the envelope. In every instance, the return addressee's names have been very similar to, but not identical to, an identifiable person. In every instance, the return addresses have been very similar to, but not identical to, an identifiable house, residence, or mailing address. Thus, all of the return addresses appear to be red herrings, and all appear to have been purposefully altered (i.e. slightly misspelling the person's name, or listing a numerical street address which is false, but is physically very close to a real address). Many of the letters repeat similar phrases not commonly used in



typical communication. For example, beginning in January 2010 many WPLs bore the phrases, “The paper [and other materials] that you are holding in your hands have been thoroughly coated [or contaminated] with ANTHRAX spores!” and “. . . hopefully you and those around you will soon die a slooow (sic) and painful death from ANTHRAX.” And “. . . Soon you will die! We have launched our attack! Die!! Die!!! Die!!.”

#### LATENT FINGERPRINTS FOUND ON TWO THREAT LETTERS

35. Forensic analysis conducted by the FBI Laboratory Division found that two of the WPLs bore identifiable latent fingerprints.

36. The WPL postmarked January 22, 2010, comprised of a BLHS pre-printed Alumni Donation “Ludden Fund” envelope and enclosed donation card bore a decorative sticker on the pre-printed envelope not placed there by BLHS when they sent the solicitations. The decorative sticker read “Holiday Cheer” and was the peel-and-stick type. A latent fingerprint found underneath this sticker (that is, in the sticky glue on the underside of the sticker) was identified as belonging to BRIAN D. NORTON, FBI number 853801P6, date of birth XX/XX/XXXX, residence 5646 Central Avenue, Cicero, New York.

37. The WPL postmarked December 16, 2011, mailed to [Victim # 2], c/o [company name and address redacted] was comprised of a commercially-produced greeting card. On the inside of that greeting card a latent fingerprint belonging to BRIAN D. NORTON, FBI number 853801P6, date of birth XX/XX/XXXX, residence 5646 Central Avenue, Cicero, New York was found.

#### SUSPECT BRIAN DANIEL NORTON

38. Department of Motor Vehicles records show that BRIAN DANIEL NORTON, date of birth XX/XX/XXXX, residence 5646 Central Avenue, Cicero, New York 13039, Client ID 891680655 holds a Non-Driver Identification card. He is listed at 5' 6" tall and has green

eyes.

39. A criminal history check shows that BRIAN D. NORTON, date of birth XX/XX/XXXX, residence 200 Lincoln Avenue, Cicero, New York, FBI # 853801P6, NYSID# 04013026L was arrested by the Syracuse Police Department on 06/10/1976 for a charge of Aggravated Harassment, a Class A Misdemeanor. The arrest number was 52752N. Syracuse City Court assigned a case number, # 635-363, but no disposition is noted.

40. The address 200 Lincoln Avenue, Cicero, New York is the same physical location as 5646 Central Avenue, Cicero, New York. The house sits on the corner of Central Avenue and Lincoln Avenue and according to officials from the United States Postal Inspection Service both addresses are valid for the same house.

41. According to records maintained by the Onondaga County Social Services Department, NORTON is a recipient of Social Security Insurance benefits. NORTON's social security account number is xxx-xx-7605 and his residence address is listed at 5646 Central Avenue, Cicero, New York.

42. According to the mail carrier, residents at 5646 Central Avenue, Cicero, New York 13039 include BRIAN NORTON, and his father.

43. According to tax records maintained by Onondaga County, the residence is owned by an individual I believe to be BRIAN NORTON's father.

EVIDENCE RECOVERED FROM DISCARDED TRASH AND A RECYCLING BIN  
FROM THE STREET OUTSIDE 5646 CENTRAL AVENUE, CICERO, NEW YORK

44. On February 3, 2013, I searched the discarded trash and/or recycling items left out at the curbside/street-side of the property located at 5646 Central Avenue, Cicero, New York. In this neighborhood, the trash and recycling collection usually occurs on Monday mornings,

so most residents discard their trash and recyclables at the street-side on Sunday evening. I collected items from the discarded trash and/or recyclables in the late night hours on Sunday/early morning hours of Monday, just after midnight.

45. On February 17, 2013, while doing this again, I found several discarded copies of the Syracuse Post Standard newspaper in an open, uncovered, street-side recycling bin. Several pages of the newspaper I recovered that day bore handwriting that is similar to the unique style of handwriting seen in the Syracuse Series WPLs, and many of the words and phrases were vulgar, similar to several of the WPLs. One page in particular bore the handwritten words, “ [VICTIM # 1]’s smelly maggot infested hairy. . .” This is significant because [VICTIM # 1] was the victim of a Syracuse Series WPL , postmarked October 18, 2010 and mailed to [VICTIM # 1], c/o [company name and address redacted]. That WPL contained a commercially-produced greeting card as well as several pieces of newsprint and advertisements, all of which had a large amount of vulgar, graphic handwritten threats to VICTIM #1, who is a nationally-known personality who regularly appears on television. Moreover, several other Syracuse Series WPLs involve either Victim # 1, Victim # 1’s company and/or television program, or other employees of Victim #1’s company. For example, the three February, 2010 WPLs mailed to [then Secretary of Defense] Robert Gates, to A.T.F. Headquarters, and to the International Association of Police, all bore a handwritten return address of “ [VICTIM # 7], [company name and address redacted].” [VICTIM # 7] is also a nationally-known personality who regularly appears on television. Furthermore, in December, 2011 [VICTIM # 7] herself was a victim of a Syracuse Series WPL when she received a WPL addressed to her at her workplace as follows, “ [VICTIM # 7] , c/o [company name and address redacted].” Finally, the most recent WPL in the Syracuse Series was also mailed in December, 2011. That letter, written inside a greeting card, was mailed to [Victim

# 2] , c/o [company name and address redacted]. Victim # 2 is also a nationally-known personality who regularly appears on television. BRIAN D. NORTON's latent fingerprint was found on the inside of the greeting card. VICTIM #1, VICTIM #2, and VICTIM #7 all work for the same company.

46. On March 3, 2013 several discarded copies of the Syracuse Post Standard newspaper were recovered from the street-side recycling bin. Amongst the newspapers was a copy of the Syracuse Post Standard Television Guide section, which includes a crossword puzzle. Handwritten in ink in the black (unused) sections within the crossword puzzle were the words, “ . . .flatulent female naked ape defecators [VICTIM # 7], . . . .” This language matches some of the handwritten language found in the Syracuse Series WPLs mailed to VICTIM #1 (mailed on October 18, 2010, containing the text, “ . . . flatulent female naked ape defecators . . .”), VICTIM # 2 (mailed on December 16, 2011, containing the text, “ . . . flatulent female naked ape defecator . . .”), and VICTIM #7 (mailed on December 16, 2011, containing the text, “ . . flatulent female naked ape defecator . . .”).

47. On March 3, 2013 several discarded copies of the Syracuse Post Standard newspaper were recovered from the street-side recycling bin. Several pages of the newspaper bore handwriting that appears similar to that seen in the Syracuse Series WPLs, and many of the words and phrases were vulgar, similar to several of the WPLs. One page in particular bore the handwritten words, “ [VICTIM # 8's] hairy . . . .” [VICTIM # 8] is an actress who has appeared on several television shows and in several movies. She was married to [Victim #8's husband], an actor who appeared in several television shows. The name [VICTIM # 8] links this discarded newspaper to two Syracuse Series WPLs – one to the Marine Corps League and one to U.S. Senator John McCain, both mailed in February, 2010. Both bore the handwritten return address of “ [VICTIM # 8] (Mrs. [Victim # 8's husband]), P.O. Box

[redacted], Beverly Hills, CA 90210.” As with all return addresses found on the Syracuse Series WPLs, these were red herrings. Moreover, the name [VICTIM # 8] is also linked to the WPL mailed on October 18, 2010 to [VICTIM # 1]. That WPL contained a greeting card and several pages of vulgar, threatening handwritten notes including a drawing of three bloody daggers (drawn in black ink, but with red ink ‘blood’ dripping from the blades) and the words, “ [VICTIM # 8] WILL NOT BE LAYING HER SMELLY . . . [VICTIM # 7]’S AND [VICTIM # 8]’S COPROLITES . . .”, as well as several other instances of [VICTIM # 8]’s name.

48. Thus, after forensic FBI Laboratory analysis of the Syracuse Series WPLs identified two (2) latent fingerprints that were identified as belonging to BRIAN D. NORTON, and after numerous records checks confirmed that BRIAN D. NORTON resides at 5646 Central Avenue, Cicero, New York, several items of discarded trash and recycling recovered from that address contain evidence that matches the handwriting, the names of the Syracuse Series victims, the names of the ‘red herring’ return addressees, and some of the specific words and phrases used in the Syracuse Series WPLs.

49. I have consulted with several Special Agents, behavioral analysts, and other specialists at FBI Headquarters and at the FBI’s forensics laboratory in Quantico, Virginia about common characteristics found in WPL cases investigated by the FBI. From these individuals, I learned, among other things, that the FBI has investigated multiple other WPL cases where searches of a suspected WPL sender’s residence – well after the WPLs were sent – found physical evidence tying the individual to the target WPLs. Such evidence has included envelopes, sticker labels, and newspaper and magazine clippings. The discovery of evidence in the discarded trash on the streetside outside NORTON’s residence well after the last known WPL believed to have been mailed by NORTON is consistent with these other WPL cases, and supports the conclusion that there is probable cause to believe that additional

evidence will be found in a search of NORTON's residence. Here, in particular, the Syracuse Series contained phrases from books by an identified author, and I believe it is likely that works by that author will be found in a search of the residence. Additionally, identifiable stickers, greeting cards, stationary, writing samples, and solicitations from educational institutions are also likely to have been kept and to be found in a search. This is supported by the discovery of Syracuse Series WPL victim's names and common phrases – all in the same distinct handwriting used in the WPLs - in a random trash cover during the investigation.

50. On April 4, 2014 I observed BRIAN D. NORTON leave his residence at 5646 Central Avenue, Cicero, New York and enter a vehicle driven by his father. They drove to Syracuse, where NORTON and his father visited the Social Security Office, located on the fourth floor of the Syracuse Federal Building, 100 South Clinton Street, Syracuse, New York. NORTON brought with him, and presented to the Social Security representative, an envelope containing Social Security and Medicaid correspondence addressed to him and a one-page handwritten note with notes on what needed to be discussed with Social Security that day. There, without any verbal assistance from his father, NORTON met with a Social Security representative to discuss a recent change in NORTON's benefits. That representative told me afterwards that NORTON spoke on his own, brought the appropriate paperwork, asked appropriate questions and appeared to understand the responses. NORTON was advised that he needed to go to the Medicaid Office and speak with Medicaid representatives to adjust his benefits. NORTON and his father then left the Federal Building and walked to the Medicaid Office, located at the County Office Building, 421 Montgomery Street, Syracuse, New York. There, NORTON spoke with a clerk regarding his Medicaid benefits. The clerk later advised me that NORTON asked appropriate questions and appeared to understand her answers. Copies of the paperwork NORTON shared with the

Social Security Office representative were obtained from Social Security. One page contained handwritten notes apparently written in two different printing styles. The printing style at the end of this handwritten note bears a distinct similarity to the handwriting used in several of the Syracuse Series WPLs.

51. The following chart provides a summary of some of the similarities between the Syracuse Series WPLs. Colored ink is used to identify specific language that is very similar (or identical) and has appeared in numerous Syracuse Series WPLs, sometimes years apart.

SIMILARITIES AMONG THE SYRACUSE SERIES WPLs

<u>DATE</u>	<u>POSTMARK</u>	<u>TO</u>	<u>FROM</u>	<u>SIMILARITIES</u>	<u>IDENTIFIABLE LATENT PRINTS</u>
November 6, 1997	Syracuse, NY	Alumni Fund Bishop Ludden High School Syracuse, NY	(none)	“ . . .DIE A SLOW AND PAINFUL DEATH . . . “ [written on alumni donation card]	
May 15, 1999	Syracuse, NY	Office of Alumni Bishop Ludden High School Syracuse, NY	(none)	“The paper and other materials that you are holding in your hands have been thoroughly saturated with <u>ANTHRAX</u> spores. . . .die a slow painful death . . . die die die.“	
May 15, 1999	Syracuse, NY	LeMoyne College Office of Alumni Syracuse, NY	(none)	“The paper and other materials that you are holding in your hands have been thoroughly coated with <u>ANTHRAX</u> spores! . . . . . die a sloooow and painful death. “	



May 8, 2002	Syracuse, NY	Alumni Fund Bishop Ludden High School Syracuse, NY	[Victim # 4] [Street Address] Camillus, NY 13031	“PRAISE ALLAH FOR SEPT. 11 YOU ARE NEXT ANTHRAX ENCLOSED CIPRO NO GOOD WE ARE WATCHING YOU PRAISE ALLAH NO MORE WTC death to Christians + jews DEATH TO ISRAEL DEATH TO AMERICA . “ [included an alumni donation card]	
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May 8, 2002	Syracuse, NY	LeMoyne College Division of Institutional Advancement Syracuse, NY	[Victim #4] [Street Address] Camillus, NY 13031	“ PRAISE ALLAH FOR SEPT.11 YOU ARE NEXT WE ARE WATCHING YOU DEATH TO ISRAEL DEATH TO CRUSADE WHO SUPPORT MASSOUD ANTHRAX IN ENVELOPE YOU DIE CIPRIO NO GOOD PRAISE ALLAH NO MORE WTC” [included an alumni donation card]	
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June 3, 2002	Syracuse, NY	Alumni Fund Bishop Ludden High School Syracuse, NY	[Victim #5] [Street Address] Syracuse, NY 13208	“OSAMA BIN LADEN LIVES . . . HAIL AL-QAIDA!” [written on alumni donation card]	
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June 3, 2002	Syracuse, NY	LeMoyne College Division of Institutional Advancement Syracuse, NY	[Victim #5] [Street Address] Syracuse, NY 13208	[written on alumni donation card]	
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January 22, 2010	Syracuse, NY	Army Association of the United States 2425 Wilson Blvd. Arlington, VA 22201	[Victim #6] [Street Address] Cicero, NY 13029	“THE PAPER THAT YOU ARE HOLDING IN YOUR HANDS HAS BEEN THOROUGHLY SATURATED WITH <u>ANTHRAX</u> POWDER . . .SOON DIE A SLOOW AND PAINFUL DEATH . . .DIE DIE DIE “	
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January 22, 2010	Syracuse, NY	Ludden Fund Bishop Ludden High School Syracuse, NY	[Victim #6] [Street Address] Cicero, NY 13029	“THE ENVELOPE YOU HAVE OPENED CONTAINS A SMALL BUT EXTREMELY POWERFUL AMOUNT OF <u>RICIN</u> POWDER. . .DIE DIE . . .YOU WILL DIE SLOWLY PAINFULLY! “ [written on alumni donation card]	BRIAN D. NORTON 5646 Central Ave, Cicero, NY Date of Birth XX/XX/XXXX
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January 21, 2010	Syracuse, NY	Federal Bureau of Investigation	[Victim #6] [Street Address] Cicero, NY 13029	“THE PAPER THAT YOU ARE HOLDING IN YOUR HANDS HAS BEEN THOROUGHLY SATURATED WITH <u>ANTHRAX</u> POWDER . . .SOON DIE A SLOOW AND PAINFUL DEATH . . .DIE DIE DIE “	
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February 1, 2010	Syracuse, NY	International Association of Police 100 Chase Avenue Yonkers, NY 10703	[Victim #7] [Street Address] WestChester, PA 19380	“ THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS <u>RICIN</u> . . .SOON DIE A SLOOW PAINFUL DEATH . . . “	
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February 1, 2010	Syracuse, NY	Marine Corps League P.O. Box 3070 Merrifield, VA 22116	[Victim #8] [P.O. Box] Beverly Hills, CA 90210	"THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS ENOUGH <u>RICIN</u> TO KILL MANY PEOPLE IN A LARGE ROOM . . . YOU WILL SOON DIE."	
February 8, 2010	Syracuse, NY	Robert Gates The Pentagon Washington, D.C. 20301	[Victim #7] [Street Address] WestChester, PA 19380	"THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS <u>RICIN</u> -A HIGHLY TOXIC SUBSTANCE . . . WILL DIE SLOWLY AND PAINFULLY FROM RICIN ENOUGH RICIN TO BRING <u>DEATH</u> TO MANY PEOPLE IN A LARGE ROOM."	
February 8, 2010	Syracuse, NY	ATF Dept. of Treasury 650 Mass Ave. NW Washington, D.C. 20226	[Victim #7] [Street Address] WestChester, PA 19380	"THE ENVELOPE THAT YOU HAVE JUST OPENED CONTAINS <u>RICIN</u> -A HIGHLY TOXIC SUBSTANCE . . . WILL DIE SLOWLY AND PAINFULLY FROM RICIN ENOUGH RICIN TO BRING <u>DEATH</u> TO MANY PEOPLE IN A LARGE ROOM."	
February 8, 2010	Syracuse, NY	Senator John McCain The Capitol Building Washington, D.C. 20515	[Victim #8.] [P.O. Box xxxx] Beverly Hills, CA 90210	"THE ENVELOPE THAT YOU ARE KEEPING NEXT TO YOU AND HAVE JUST OPENED CONTAINS ENOUGH <u>RICIN</u> TO KILL MANY PEOPLE IN A VERY LARGE ROOM . . . WILL SOON DIE A SLOW & PAINFUL DEATH."	

October 18, 2010	Syracuse, NY	[Victim # 1] c/o [company name] [address redacted] WestChester, PA	[Victim #9] [Street Address] Jordan, NY 13080	“THE ENVELOPE that you just opened contains ACTUAL <u>RICIN</u> ! You and those around you will die slowly & painfully . . .ARE ANDROGYNOUS MENOPAUSAL OLD PUBIC HAIRED FLATULENT FEMALE NAKED APE DEFECATORS.”	
May 6, 2011	Syracuse, NY	[Victim # 3] [Street Address] North Syracuse, NY 13212	[Victim #10] [Street Address] E. Syracuse, NY 13057	“THE PAPER AND OTHER MATERIALS THAT YOU ARE HOLDING IN YOUR HANDS HAVE BEEN THOROUGHLY CONTAMINATED WITH <u>ANTHRAX</u> SPORES . . .SOON DIE A SLOOOW PAINFUL DEATH . . .DIE DIE . . .Usama Bin Laden will be avenged.”	
May 6, 2011	Syracuse, NY	Rep. Ann Marie Buerkle 25 <sup>th</sup> Congressional District P.O. Box 7306 Syracuse, NY 13261	[Victim #11] [Street Address] Syracuse, NY 13221	“Usama bin Laden will be avenged! The paper and other materials that you are holding in your hands have been thoroughly contaminated with <u>anthrax</u> spores . . .will die a slooow painful death . . . Die Die.”	

December 16, 2011	Syracuse, NY	[Victim #7] c/o Infinity Publishing 1094 New DeHaven Street Suite 100 West Conshohocken, PA 19428-2713	[Victim #12] [Street Address] Skaneateles, NY 13152	“YOU ARE AN ANDROGYNOUS MENOPAUSAL PUBIC HAIRE FLATULENT FEMALE NAKED APE DEFECATOR . . .THE ENVELOPE THAT YOU HAVE JUST OPENED HAS BEEN THOROUGHLY CONTAMINATED WITH <u>ANTHRAX</u> SPORES.	
December 16, 2011	Syracuse, NY	National Navy UDT-Seal Museum 3300 N. Highway A1A Fort Pierce, FL 34981	[Victim #13] [Street Address] Skaneateles, NY 13152	“USAMA bin LADEN <u>WILL</u> BE AVENGED! THE PAPER AND OTHER MATERIALS THAT YOU ARE HOLDING IN YOUR HANDS HAVE BEEN THOROUGHLY CONTAMINATED WITH <u>ANTHRAX</u> SPORES . . .YOU WILL DIE A SLOOOW PAINFUL DEATH . . .”	
December 16, 2011	Syracuse, NY	[Victim # 2] c/o [company name] [address redacted] WestChester, PA	[Victim #13] [Street Address] Skaneateles, NY 13152	“YOU ARE AN ANDROGYNOUS MENOPAUSAL PUBIC HAIRE FLATULENT FEMALE NAKED APE DEFECATOR . . .THE ENVELOPE THAT YOU HAVE JUST OPENED HAS BEEN THOROUGHLY CONTAMINATED WITH <u>ANTHRAX</u> SPORES.”	BRIAN D. NORTON 5646 Central Ave, Cicero, NY Date of Birth XX/XX/XXXX

Items retrieved from trash covers at the residence of BRIAN D. NORTON, 5646 Central Avenue, Cicero, NY

<u>DATE</u>	<u>ITEM FOUND IN TRASH</u>	<u>SIMILARITIES</u>
February 17, 2013	Newspaper page with handwritten notes	"[VICTIM # 1]'S ..."
March 3, 2013	Newspaper page with handwritten notes	"[VICTIM # 8]'S ..."
March 3, 2013	Television guide from newspaper with handwritten notes	"The hideous pubic haired flatulent female naked ape defecators [VICTIM # 7], ..."


CONCLUSION

52. Based on the foregoing facts, I submit there is probable cause to believe that BRIAN DANIEL NORTON has conveyed false information threatening injury or death by poisoning or infection on multiple occasions and has used the U.S. postal system to send letters containing such threats, in violation of Title 18, United States Code, Sections 1038 and 876, from beginning in or about 1997 through in or about 2012.

WHEREFORE, I respectfully submit that the Court authorize a criminal complaint, and an accompanying arrest warrant, charging BRIAN DANIEL NORTON with violating Title 18, United States Code, Sections 1038 and 876(c).

  
Daniel Capone  
Special Agent, FBI

Sworn to before me this 9<sup>th</sup>  
day of June, 2014.

  
Hon David E. Peebles  
United States Magistrate Judge